

# EXHIBIT 1

THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE

IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS LIABILITY  
LITIGATION

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MDL No. 19-2875 (RBK)

THIS DOCUMENT RELATES TO  
*Lana Dufrene, 1:19-cv-15633*

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**SUGGESTION OF DEATH**

Heather Guidroz, daughter of Lana Dufrene suggests upon the record, pursuant to Rule 25(a)(1) of the Federal Rules of Civil Procedure, the death of Lana Dufrene, Plaintiff of record in the above captioned case. Ms. Dufrene passed away on July 8, 2022 during the pendency of this action. Ms. Dufrene's surviving daughter will be filing the appropriate pleadings to appear as the substituted plaintiff in this matter.

Dated: January 17, 2025

Respectfully submitted,

/s/ M. Palmer Lambert

M. Palmer Lambert (Bar No. 33228)

**PENDLEY, BAUDIN & COFFIN**

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*Attorney for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 17, 2025, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record who are CM/ECF participants.

/s/ M. Palmer Lambert

**M. PALMER LAMBERT**